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15:40

PHYSICAL PLANT → 2024182820

NO. 860

001

Clark University  
Telecommunications  
950 Main Street  
Worcester, MA 01610  
(508) 793-7381

# facsimile transmittal

## SUNSHINE PERIOD

To: Commissioner Michael K. Powell Fax: 202 418-2820

From: Paul Bottis, Jr. Date: February 10, 2000  
Director of Telecommunications

Re: Re: WT Docket No. 97-207: Pages: 3  
Calling Party Pays Service  
Offering in the Commercial  
Mobile Radio Services

CC:

☒ Urgent

☐ For Review

☐ Please Comment

☐ Please Reply

☐ Please Recycle



# CLARK UNIVERSITY

950 Main Street Worcester Massachusetts 01610-1477

Telecommunications Department

Telephone (508) 793-7381

February 10, 2000

Commissioner Micheal K Powell  
Federal Communications Commission  
Room 8-A204  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services**

Dear Commissioner Powell:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Clark University has closely followed the Calling Party Pays ("CPP") rule making proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Clark University to significant financial liability that would undermine our ongoing effort to provide educational services.

Clark University currently has over 3,000 full-and part-time students and 800 full and part time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the



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Commissioner Michael K. Powell

Page 2

February 10, 2000

institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Clark University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Paul Bottis, Jr.

Director of Telecommunications

Cc: Mr. Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell

Clark University  
Telecommunications  
950 Main Street  
Worcester, MA 01610  
(508) 793-7381

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## SUNSHINE PERIOD

To: Peter A. Tenhula Senior Legal Advisor Fax: 202 418-2820  
to Commissioner Michael K. Powell

From: Paul Bottis, Jr. Date: February 10, 2000  
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Re: Re: WT Docket No. 97-207: Pages: 3  
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February 10, 2000

Commissioner Micheal K Powell  
Federal Communications Commission  
Room 8-A204  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services**

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Sincerely,

Paul Bottis, Jr.

Director of Telecommunications

Cc: Mr. Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell

**University of Idaho**Information Technology Services  
Moscow, Idaho 83844-3155

208-885-6721

February 10, 2000

Commissioner Michael K. Powell  
Federal Communications Commission  
Room 8-A204  
445 Twelfth Street, SW  
Washington, DC 20554

## SUNSHINE PERIOD

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Powell:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, University of Idaho has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the University of Idaho to significant financial liability that would undermine our ongoing effort to provide educational services. University of Idaho currently has 10,000 students and 2500 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized Centrex system controlled by the telecommunications department. Our existing system can easily be programmed to block, or track call detail for variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the system recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our system will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

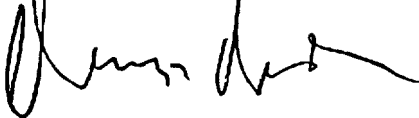
We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by the University of Idaho. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

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or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

A handwritten signature in black ink, appearing to read 'Harvey Hughett', with a stylized flourish at the end.

Harvey Hughett  
Director, Information Technology Services

**University of Idaho**Information Technology Services  
Moscow, Idaho 83844-3155

208-885-6721

February 10, 2000

Commissioner Harold W. Furchtgott-Roth  
Federal Communications Commission  
Room 8-A302  
445 Twelfth Street, SW  
Washington, DC 20554

## SUNSHINE PERIOD

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Furchtgott-Roth:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, University of Idaho has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the University of Idaho to significant financial liability that would undermine our ongoing effort to provide educational services. University of Idaho currently has 10,000 students and 2500 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

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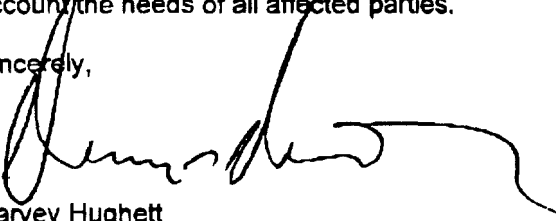
We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by the University of Idaho. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

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Sincerely,

A handwritten signature in black ink, appearing to read 'Harvey Hughett', with a long, sweeping horizontal line extending to the right.

Harvey Hughett  
Director, Information Technology Services



The Southern Baptist Theological Seminary  
2825 Lexington Road  
Louisville, KY 40280  
Fax: (502) 897-4202

Date: 2/10/2000

SUNSHINE PERIOD

To: Peter A. Teshala

Fax: 202-418-2826

From: Maria Medley, Director of MTS

Fax: 502-897-4202

Phone: 502-897-4106

Number of pages (including cover sheet): 3

Messages:



## The Southern Baptist Theological Seminary

February 10, 2000

Commissioner Michael K. Powell  
Federal Communications Commission  
Room 8-A204  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Powell:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, The Southern Baptist Theological Seminary has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose The Southern Baptist Theological Seminary to significant financial liability that would undermine our ongoing effort to provide educational services.

The Southern Baptist Theological Seminary currently has over 1600 students and over 500 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

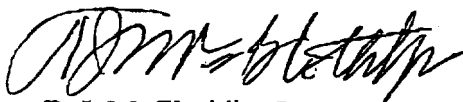
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We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by The Southern Baptist Theological Seminary. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

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Sincerely,



T. J. McGlothlin, Jr.  
Vice President for Business Services

cc: Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell

WHEATON COLLEGE  
26 E. MAIN ST., NORTON, MA 02766  
(508) 285-7722 FAX: (508) 285-8270

## FAX COVER SHEET

SUNSHINE PERIOD

DATE: 2-10-00 TIME: \_\_\_\_\_To: Mr. Peter Tenhula  
\_\_\_\_\_  
\_\_\_\_\_FROM: David Caldwell PHONE: 508-286-3400  
\_\_\_\_\_  
\_\_\_\_\_Number of Pages, Including Cover Sheet 3☐ Urgent☐ Confidential☐ Normal*Please call sender if you have trouble receiving or if any pages are missing.*

Comments:

Wheaton College  
 Norton, Massachusetts 02766-0930  
 (508) 285-7722  
 FAX (508) 285-8270

# Wheaton

February 10, 2000

Commissioner Michael K. Powell  
 Federal Communications Commission  
 Room 8-A204  
 445 Twelfth Street, SW  
 Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Powell:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Wheaton College has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Wheaton College to significant financial liability that would undermine our ongoing effort to provide educational services.

Wheaton College currently has over 1400 full-time or full-and part-time students and 500 full and part-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of unbillable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers). Based on the unique numbering scheme associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

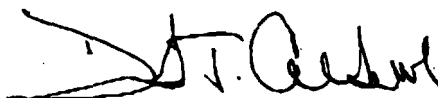
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Sincerely,



David T. Caldwell  
Director, Information Technologies & Services

cc: Mr. Peter Tenhula, Senior Legal Advisor to Commissioner Powell